

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,  
AND IRBESARTAN PRODUCTS  
LIABILITY LITIGATION**

**This Document Relates to:**

**Smalls v. Zhejiang Huahai  
Pharmaceutical Co., Ltd. et al.  
Case No. 1:20-cv-08199-RMB-SAK**

**Garcia v. Zhejiang Huahai  
Pharmaceutical Co., Ltd. et al.  
Case No. 1:20-cv-07957-RMB-SAK**

**Suits v. Zhejiang Huahai  
Pharmaceutical Co., Ltd et al.  
Case No. 1:20-cv-06547-RMB-SAK**

**Lee v. Zhejiang Huahai  
Pharmaceutical Co., Ltd. et al.  
Case No. 1:20-cv-15324-RMB-SAK**

MDL No. 2875

Honorable Renée Marie Bumb,  
Chief Judge

**ORDER  
ESTABLISHING  
AMENDED CASE  
MANAGEMENT  
SCHEDULE  
FOR WAVE 2  
BELLWETHER CASES**

**The Special Master Having Previously Entered** the Order Establishing  
Case Management Schedule for Wave 2 Bellwether Cases on March 12, 2025 (ECF  
No. 2988),

**The Parties Having Met and Conferred**, to agree upon the amended case management schedule for the second wave of potential personal injury bellwether plaintiff trials (“Wave 2 BW”) in the following matters:

1. Garcia, Robert – 1:20-cv-07957
2. Lee, Robert – 1:20-cv-15324
3. Smalls, Evon – 1:20-cv-08199
4. Suits, James – 1:20-cv-06547

**Having Reviewed** the proposed agreed upon, amended schedule,

**IT IS ORDERED:** the deadlines for the four above matters previously established in ECF No. 2988 are amended and the deadlines for the four above matters are:

<b>Wave 2 BW Trial Event</b>	<b>Wave 2 BW Trial Date</b>
Deadline to amend Plaintiff Fact Sheet	3/14/2025
Close of case-specific fact discovery	6/9/2025
Deadline for Plaintiff to designate experts and serve expert report(s)	6/16/2025
Deadline for Defendants to designate experts and serve expert report(s)	7/18/2025
Depositions of experts	7/18/2025 – 8/20/2025
Close of expert discovery	8/20/2025
Deadline for parties to exchange deposition designations	9/2/2025 (Completion of rolling exchange)
Deadline to file: (i) Rule 702 motions; and (ii) summary judgment motions	9/10/2025

Deadline to submit deposition designations, objections, and counter-designations to the Court	9/29/2025
Deadline to file oppositions to: (i) Rule 702 motions; and (ii) summary judgment motions	10/13/2025
Deadline to file replies in further support of: (i) Rule 702 motions; and (ii) summary judgment motions	10/27/2025
Parties to submit (joint or separate if no agreement) position statement(s) to Court on proposed selection of Wave 2 bellwether trial case	3 business days after the Court's ruling on Rule 702/MSJs
Deadline to file motions in limine	10/31/2025*
Deadline to file oppositions to motions in limine	11/14/2025*
Deadline to submit joint final pretrial order	11/24/2025*

\* Dates to be adjusted pending Court's identification of trial start date

Date: 5/14/2025

/s/ Thomas I. Vanaskie  
Hon. Thomas I. Vanaskie (Ret.)  
Special Master